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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

GRACIELA LIZARDI ESTRADA,)	Case No.: 5:16-cv-06998-EJD
)	
Plaintiff,)	JOINT STUPULATION AND
)	PROPOSED ORDER FOR EXTENSION
vs.)	OF TIME
)	
)	
NANCY A. BERRYHILL)	
Acting Commissioner of Social Security,)	
)	
Defendant.)	

Defendant Nancy A. Berryhill, Acting Commissioner of Social Security (“Defendant”) respectfully requests that the Court extend the time for Defendant to file her Opposition to Plaintiff’s Opening Brief, originally due on June 15, 2017, by 30 days, through and including Monday, July 17, 2017 (30 days falls on the preceding weekend). This is the Commissioner’s first request for an extension of time in this matter.

An extension of time is needed in order to prepare Defendant’s opposition because of the drafting attorney’s workload in the current two-week period, including a Ninth Circuit answering brief, two summary judgment motions, an EAJA opposition, and a motion to remand, in addition to the brief due in this matter. In addition, counsel is getting married on June 24, which has

1 caused significant additional pressure on counsel's schedule. This request is made in good faith
2 with no intention to unduly delay the proceedings.

3 Counsel's office conferred with Plaintiff's counsel, who had no objection to this request,
4 on June 21, 2017.

5
6 Respectfully submitted,

7 Dated: June 21, 2017

8 BRIAN STRETCH
9 United States Attorney
10 DEBORAH LEE STACHEL
11 Regional Chief Counsel, Region IX
12 Social Security Administration

13 By: /s/ Adam Lazar
14 ADAM LAZAR
15 Special Assistant U.S. Attorney
16 Attorneys for Defendant

17 **ORDER**

18 IT IS SO ORDERED.

19 Date: June 21, 2017

20 By: 
21 THE HON. EDWARD J. DAVILA
22 UNITED STATES MAGISTRATE JUDGE
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